

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DALENA LAFFERTY,

Plaintiff,

v.

COBB COUNTY SCHOOL
DISTRICT,

Defendant.

Civil Action No. No.
1:21-cv-00604

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING TO PLAINTIFF'S COMPLAINT**

Defendant, with the consent of Plaintiff's counsel, respectfully moves this Court to extend the deadline to file a responsive pleading to Complaint, showing this Court the following:

1. On February 10, 2021, Plaintiff filed her Complaint against the District.
(Doc. 1.)
2. On February 17, 2021, Plaintiff's counsel and Defendant's prior counsel agreed to a waiver of service, making any responsive pleading to Plaintiff's Complaint due on April 19, 2021.

3. On March 18, 2021, the Cobb County School District's Board of Education approved new legal counsel for the Defendant, transferring all matters from the law firm of Gregory, Doyle, Calhoun & Rogers, LLC to the law firm of Nelson Mullins Riley & Scarborough.
4. In addition to the current Complaint, Plaintiff also had previously initiated matters before the E.E.O.C. and against Defendant and others in Georgia state court, the latter of which is now pending before the Georgia Court of Appeals.
5. The prior law firm began transferring electronic and hard-copy files for all of Defendant's matters from late March through early April.
6. Because the undersigned has not had an opportunity to fully review the files of Plaintiff's matters against Defendant, the undersigned reached out to counsel for Plaintiff and requested a forty-five (45) day extension of time to file a responsive pleading to Plaintiff's Complaint from the current due date of April 19, 2021.
7. Counsel for Plaintiff has consented to that requested extension of time, which would now make a responsive pleading due on or before June 3, 2021.

8. Defendant, therefore, asks this Court to extend the deadline to file a responsive pleading to Plaintiff's Complaint to June 3, 2021, to allow Defendant and its counsel sufficient time to prepare a responsive pleading.

Respectfully submitted this 16th day of April, 2021.

/s/ Laurance J. Warco

Laurance J. Warco

Georgia Bar No. 736652

Counsel for Defendant

NELSON MULLINS RILEY & SCARBOROUGH LLP

Atlantic Station – Suite 1700

201 17th Street, NW

Atlanta, GA 30363

(404) 322-6000 (phone)

(404) 322-6050 (facsimile)

Email: laurance.warco@nelsonmullins.com

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing was prepared using Times New Roman font, 14-point type, which is one of the font and print selections approved by the Court in L.R. 5.1(B).

This the 16th day of April, 2021.

/s/ Laurance J. Warco

Laurance J. Warco

Georgia Bar No. 736652

Counsel for Defendant

NELSON MULLINS RILEY & SCARBOROUGH LLP

Atlantic Station – Suite 1700

201 17th Street, NW

Atlanta, GA 30363

(404) 322-6000 (phone)

(404) 322-6050 (facsimile)

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CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the within and foregoing *Consent Motion for Extension of Time to File Responsive Pleading to Plaintiff's Complaint* with the Clerk of Court using the CM-ECF system which will automatically send e-mail notification of such filing to the following counsel of record:

E. Linwood Gunn, IV
The Gunn Law Firm, LLC
244 Roswell Street, Suite 100
Marietta, GA 30060
elg@atldiscriminatorylawyers.com

This the 16th day of April, 2021.

/s/ Laurance J. Warco

Laurance J. Warco
Georgia Bar No. 736652
Counsel for Defendant

NELSON MULLINS RILEY & SCARBOROUGH LLP
Atlantic Station – Suite 1700
201 17th Street, NW
Atlanta, GA 30363
(404) 322-6000 (phone)
(404) 322-6050 (facsimile)
Email: laurance.warco@nelsonmullins.com